

Response ID ANON-ZYNJ-3K88-S

Submitted to Proposals for a Heat in Buildings Bill: Consultation
Submitted on 2024-03-07 14:45:24

2. The Heat in Buildings Standard - covering heating and energy efficiency

1 To what extent do you support our proposal to prohibit the use of polluting heating systems in all buildings after 2045?

Strongly support

Please include any additional comments below:

The Scottish and Northern Ireland Plumbing Employers' Federation (SNIPEF) wholeheartedly endorses initiatives that contribute to global carbon emission reduction and climate change mitigation efforts.

While commendable for its ambition, the commitment to move towards non-polluting heating systems by 2045 must be underpinned by the availability of viable, affordable alternatives. It is imperative that this transition is underpinned by robust support for households and businesses, coupled with incentives that ensure a fair transition, safeguarding against undue burdens on vulnerable communities.

Furthermore, SNIPEF advocates for the proposal and its emphasis on supporting the vulnerable; however, it is paramount that the economic implications of moving to cleaner heating solutions do not unduly impact middle-income families, many of whom are already facing financial pressures due to the rising cost of living. These families, often constrained by limited budgets, are also affected by escalating energy costs.

A nuanced approach is essential, calling for a diversification of funding and support mechanisms to distribute the financial load more fairly across broader societal strata.

Considering the proposed ban on polluting heating systems by 2045, understanding the potential impact on Scottish households is critical. To grasp the transition's breadth, an exhaustive evaluation of the number of residences currently dependent on fossil fuel heating is vital. This information will guide the strategic planning and resource allocation necessary to facilitate a seamless switch to greener heating solutions within the stipulated timeline.

The capacity of the skilled workforce within the heating and plumbing profession to meet the surge in demand for clean heating installations is equally crucial. Assessing the readiness of the current workforce to tackle this upsurge, including the availability of skilled professionals, the necessity for further training programmes, and the opportunities for job creation in the sector, is essential. Achieving the lofty aim of converting all buildings to non-polluting heating systems by 2045 hinges on a strategic commitment to workforce development and skills training.

It is also important that the Scottish Government do not inadvertently encourage a rush on or exacerbate refrigerants with high Global Warming Potential ratings, as with hundreds of thousands of heat pumps installed, there will be a proliferation in refrigerant gas use /needs. We would encourage the Government to give consideration to this aspect of the move to clean fuels, alongside trajectories for F-Gas regulations and phase outs.

2 To what extent do you agree that we should introduce a minimum energy efficiency standard to be met by private sector landlords by the end of 2028 (even if they are already using clean heating)?

Strongly support

Please include any additional comments below:

The Scottish and Northern Ireland Plumbing Employers Federation (SNIPEF) fully supports the introduction of a minimum energy efficiency standard for private-sector landlords by the end of 2028.

We acknowledge the critical role that a building's structural efficiency plays in complementing the adoption of clean heating systems to create sustainable living spaces. By mandating these upgrades, landlords will be encouraged to enhance their properties for better energy performance, which will lead to considerable long-term reductions in energy usage for tenants.

This initiative is vital for preventing prohibitively high costs for householders associated with inefficient buildings and aligns with our broader goal of reducing energy consumption. Ensuring that properties meet these minimum efficiency standards before transitioning to clean heating solutions is a key step towards decreasing overall energy demand and, in turn, lowering energy bills for tenants, including those in homes with existing clean heating systems.

The time frame of 2028 does, however, seem restrictive and too sudden. By the time this legislation comes in, there may only be 2 or 3 years to this deadline. This could put pressure on more fundamental budgets set aside for safety upgrades, potentially making such upgrades secondary to heat upgrades. A longer timeframe may be more appropriate.

3 To what extent do you agree that we should introduce a minimum energy efficiency standard to be met in owner occupied homes (which still have a polluting heating system) by the end of 2033?

Somewhat support

Please include any additional comments below:

SNIPEF agrees to introduce a minimum energy efficiency standard for owner-occupied homes with polluting heating systems by the end of 2033. This measure encourages homeowners to improve their properties' energy performance, which can reduce energy consumption and emissions, contribute to environmental goals, and potentially lower energy bills.

4 Do you agree with our proposal to set a minimum energy efficiency standard that can be met by either installing a straightforward list of measures, or showing a good level of energy efficiency based on a reformed EPC fabric efficiency metric?

Somewhat support

Please include any additional comments below:

While the proposal to set a minimum energy efficiency standard offers flexibility and inclusivity, it could impose financial strains on some property owners, particularly in the current economic climate.

The diversity of property types might also mean that not all homes can feasibly meet the standards through prescribed measures or EPC metrics, potentially leading to uneven application and effectiveness.

Moreover, relying on a reformed EPC metric could complicate the assessment process, making it challenging for owners to comply and for authorities to enforce the standards effectively.

However, this proposal is a good start.

5 What is your view on the initial proposed list of measures to meet the minimum energy efficiency standard?

Strongly support

Please include any additional comments below:

The proposal includes a sensible list of measures that should be achievable, either in full or in part, by property owners. This approach allows for flexibility and practicality in meeting energy efficiency standards.

Some fundamental practicalities need to be worked through, some of which (eg. traditional buildings) are discussed later within the proposals. A greater degree of collaboration between Historic Environment Scotland, Planning Departments, and Building Standards will be needed to allow some of the improvements to be applied in many buildings.

6 Do you think that properties for which most or all of the measures on the initial proposed list are not relevant should be required to meet an equivalent minimum energy efficiency standard?

D. Yes – they should be required to meet the standard and additional measures should be included on the list (such as solid wall insulation, solid floor insulation and flat roof insulation), but they should only be required to install some of these where feasible, and they should be allowed additional time to do so.

Please include any additional comments below:

SNIPEF agrees that properties for which the majority of the initial proposed measures are not applicable should still adhere to an equivalent minimum energy efficiency standard.

It is crucial to expand the list to include additional measures like solid wall insulation, solid floor insulation, and flat roof insulation. However, it's essential that these measures are mandated only when feasible, and property owners should be granted extra time for implementation.

This approach strikes a balance between the imperative of enhancing energy efficiency and the practical realities faced by property owners. By allowing for a degree of flexibility and additional time, we ensure that the measures are both economically viable and technically achievable across various property types. This thoughtful consideration encourages broader compliance and facilitates meaningful energy savings, enabling householders to devise and execute a compliance plan that is both effective and affordable over time.

7 Do you think that an alternative approach to setting the minimum energy efficiency standard is required?

Don't know

Please include any additional comments below:

Any approach taken must offer flexibility, adaptability, and inclusivity, ensuring that the standard remains relevant and achievable across different building types and circumstances.

8 Do you agree that the use of bioenergy should continue to be permitted in certain circumstances?

Yes, it should be permitted for those buildings already using it and for those buildings who have no other clean heating system available

Please include any additional comments below:

This change indicates the risks of short-term thinking. Only recently was the government paying people to burn biomass via the Renewable Heat Incentive. An economy and infrastructure will be built around this. It is, therefore, important that those already using bioenergy have a longer period to phase out their equipment. After all, the embodied carbon to form this infrastructure and equipment will already have been invested.

3. Property Purchases

9 To what extent do you support the requirement to end the use of polluting heating following a property purchase?

Strongly support

Please include any additional comments below:

SNIEPF supports the requirement to end polluting heating after a property purchase. However, the support would depend on its execution details, such as the feasibility for property owners, the financial support available, and the impact on emissions reduction.

It is also essential to acknowledge that middle-income families, who often make up the majority of homebuyers, should not bear the entire financial burden of these transitions. Equitable solutions are imperative. Financial institutions, such as banks, could play a pivotal role in this regard. Encouraging banks to offer near-zero interest improvement loans as part of green mortgage packages or providing options for delayed payments would alleviate the financial strain on homeowners.

This approach promotes fairness and ensures a more inclusive and sustainable transition to cleaner heating solutions. It strikes a balance between environmental responsibility and the financial well-being of property owners, ultimately contributing to a greener and more equitable future.

A higher purchase mechanism may be worth considering in order to alleviate capital costs to demographics and communities unable to afford upgrades.

10 We are proposing to give those purchasing a property a 'grace period' to end their use of polluting heating. Do you agree with this proposal?

Yes – the grace period should be three years.

Please include any additional comments below:

11 To what extent do you support our proposal to apply a cost-cap where people are required to end their use of polluting heating following a property purchase?

Strongly oppose

Please include any additional comments below:

The Scottish and Northern Ireland Plumbing Employers' Federation (SNIEPF) firmly opposes the proposal to impose a cost cap on the installation of cleaner heating systems. We believe that such a cap could inadvertently disadvantage installers financially, affecting the market's overall health.

Protecting against unfair practices within the industry is crucial. However, maintaining a profitable market is equally important, as it encourages skilled professionals to enter the sector, thereby increasing the availability of qualified installers. This expansion is vital for the widespread adoption and successful implementation of cleaner heating solutions.

We argue that a more nuanced approach is needed, one that does not rely on a simplistic cost cap. The complexity of installations varies greatly, with factors such as the size of the property and the extent of the work required contributing to this variability. Imposing a uniform cap could lead to unfair outcomes, disadvantaging properties that may inherently require more extensive work.

SNIEPF urges the government to engage in a detailed and collaborative dialogue with industry stakeholders. This conversation should aim to identify solutions that ensure the financial sustainability of installers and the sector at large while still advancing environmental objectives. Achieving a balance between ensuring market profitability and meeting environmental targets is crucial for the long-term success of cleaner heating initiatives and their acceptance by both installers and property owners.

12 Which of the following methods of applying a cost-cap do you support?

None.

If another, please suggest below:

13 To what extent do you support the proposal that the Scottish Ministers should be given powers to extend the circumstances in future (beyond a property purchase) in which people could be required to end their use of polluting heating? This could be, for example, preventing the installation of new fossil fuel boilers when replacing the heating in your home or business premises?

Somewhat support

Please include any additional comments below:

4. Connecting to Heat Networks

14 To what extent do you support our proposal to provide local authorities (and Scottish Ministers) with powers to require buildings within a Heat Network Zone to end their use of polluting heating systems by a given date?

Somewhat support

Please include any additional comments below:

SNIEPF supports the proposal as this approach aligns with the goal of transitioning to cleaner heating systems and can contribute to environmental sustainability.

However, to ensure the successful adoption of cleaner heating solutions, it is essential to implement such powers thoughtfully, considering their practicality for building owners, financial support, and a fair transition process.

However, this authority would present the risk of building owners (particularly Commercial buildings) losing out on the life cycle of equipment that may have been installed recently. There is also a need for technical appraisals to verify the validity of buildings to connect. For example for older listed buildings to connect into heat networks without deep retrofit of pipework, emitters etc, there will be a need for the heat network to offer higher temperatures than may be ideal for heat network distribution and so connection – although enforceable – may not be appropriate.

15 To what extent do you support our proposal to provide powers to local authorities (or Scottish Ministers) that require developers to connect new buildings within Heat Network Zones to a heat network?

Somewhat support

Please include any additional comments below:

SNIEPF supports the proposal as this measure encourages the expansion of heat networks and promotes the use of cleaner heating systems from the outset in new developments.

It aligns with the goal of reducing polluting heating and advancing environmental sustainability.

However, it's important that these requirements are implemented with consideration for the practicality and feasibility of heat network connections for developers, ensuring a smooth transition to cleaner energy solutions.

Commercial buildings, more often than not, require a cooling network loop. This can be easily achieved by installing a heat pump chiller, a unit which provides simultaneous heating and cooling. If such a commercial building were forced to connect to a heat network, the developer would still have to procure a chiller. A heat-pump chiller can reclaim waste heat from the cooling loop and, as such, can provide a better, more sustainable solution than a standalone heat network + building-specific chiller. As such, a heat network may not best serve commercial buildings requiring cooling. This is a fundamentally important point that needs to be accepted.

16 To what extent do you support our proposal to require occupiers of non-domestic properties to provide information about unused heat on their premises?

Somewhat support

Please include any additional comments below:

SNIEPF supports the proposal to provide information about unused heat on their premises, provided that data privacy is securely maintained.

This proposal can help identify surplus and available capacity; it can, therefore, help to create micro-grids for heat distribution. Within a City like Glasgow City Centre, over the next few years, there will be hundreds of Mega-Watt Heat-Pump capacities sitting idle for 6 – 8 months per year. This installed capacity could help support clean energy networks.

17 To what extent do you support our proposal to potentially require buildings with unused heat to provide this to a local heat network?

Somewhat support

Please include any additional comments below:

SNIEPF supports this proposal as it aligns with the goal of utilising excess heat resources and promoting environmental sustainability.

However, it's crucial to assess the practicality and feasibility of such requirements for building owners and ensure that the transition process is fair and economically viable.

This principle ultimately forms micro-grids for heat with lots of exchanges. Metering and managing this needs attention. Systems such as Blockchain trading could be useful to support this. Mandates on flow and return temperatures would need to be set.

5. Monitoring and Enforcement

18 We will need to have a way to monitor if people are meeting the Heat in Buildings Standard, and discussed two options for this. Which do you support?

A combination of the two

Please include any additional comments below:

The combination of EPC and sampling balances thoroughness with practicality, ensuring a broad and representative assessment of compliance while minimising the burden on building owners and the administrative system.

Sampling allows targeted inspections to verify EPC accuracy and building performance, addressing potential discrepancies or fraudulent practices.

19 We will need to have a way to enforce the Heat in Buildings Standard. We discussed possible options to help achieve compliance. What are your views on these ideas?

I support relying on market and financial product mechanisms such as mortgages or home/ building insurance.

Please include any additional comments below:

SNIEF actually supports bullets one and two.

20 To what extent do you support our proposals to modify the Standard or exempt certain people from the need to meet the Heat in Buildings Standard?

Somewhat support

Please include any additional comments below:

Introducing exemptions is a reflection of the broader challenges in achieving sustainable and energy-efficient living. Modifications might be necessary to account for technological advancements, socio-economic factors, or unique architectural characteristics that make strict adherence to the initial standards either impractical or economically unfeasible for some.

On the other hand, an approach that is too lenient risks diluting the ambitious goals set to mitigate climate change impacts, potentially leading to significant variances in energy performance and carbon emissions reductions across the sector.

21 Which people, businesses, or types of buildings, if any, should be eligible for a modified standard or exemptions?

Please include any additional comments below:

- Historic or listed buildings where restrictions exist on modifications.
- Remote properties with limited access to technologies or infrastructure
- Hospitals, critical care and healthcare premises with phasing issues or heat capacity issues.

22 To what extent do you support our proposals to give certain people extra time to meet the Heat in Buildings Standard?

Somewhat support

Please include any additional comments below:

Giving certain people extra time to meet the Heat in Buildings Standard is a proposal that warrants considerable support, particularly when it is focused on ensuring that the transition to more energy-efficient buildings is fair and practical and considers the diverse circumstances of building owners and occupants.

However, while supporting the proposal to a significant extent, it is also crucial to ensure that such extensions are not overly generous to the point where they undermine the urgency of climate action and energy efficiency goals.

Clear deadlines should be established to ensure that the extensions are a bridge to compliance, not an indefinite postponement. Regular monitoring and support should accompany these extensions to ensure progress towards meeting the standards within the extended timeframes.

23 Which people, businesses or types of buildings, if any, should be eligible for extra time?

Please include any additional comments below:

SNIEF acknowledges the necessity of setting a minimum energy efficiency standard for properties. However, we emphasise the importance of considering the unique challenges faced by low-income households in meeting these standards. We advocate for the availability of grants and other financial support mechanisms to assist these households in making the required upgrades without undue financial strain.

Given the complexity and potential high costs associated with certain properties—particularly those requiring specific or extensive modifications—we propose allowing additional time for compliance in such cases. This extended timeline should not be open-ended but must be accompanied by a detailed plan for implementation, outlining clear steps and a realistic timeframe for achieving compliance.

This approach ensures that while progress towards energy efficiency is maintained, it is done so with an understanding of and sensitivity to different households' varied capabilities and resources. It encourages a more inclusive and equitable path to compliance, providing support where needed and allowing for flexibility in how standards are met, particularly for those most at risk of financial hardship.

6. Public Sector Buildings

24 To what extent do you support our proposal to require all buildings owned by a Scottish public authority to be using clean heating systems by 2038?

Strongly support

Please include any additional comments below:

SNIFE strongly supports the proposal for all buildings owned by Scottish public authorities to transition to clean heating systems by 2038, recognising the influential role the public sector can play in leading sustainability efforts. The transition sets a benchmark for private entities and fosters the growth of the low-carbon heating market through increased demand, potentially driving down costs through economies of scale and spurring innovation.

However, we must also address the significant financial implications of this transition, particularly for councils managing older buildings that may require substantial retrofitting to accommodate clean heating systems effectively. Given the financial constraints many councils already face, the prospect of undertaking such costly upgrades without impacting service provision is a considerable challenge.

Therefore, while we advocate for adopting clean heating in public sector buildings, we urge the government to consider providing adequate financial support and resources to facilitate this transition. It is essential to ensure that councils are not left to bear the financial burden alone, which could reduce public services. A collaborative approach involving targeted funding and support mechanisms is crucial to achieving these environmental goals without compromising the quality of public services.

This balanced perspective acknowledges the importance of leading by example in environmental stewardship while recognising the practical challenges and financial realities faced by public authorities in Scotland.

Local authorities also need to recognise the life cycle of some of the technologies involved in decarbonising heat: heat pumps and electric panels. These systems have a shorter lifespan than boilers, so replacement budgets need to be raised alongside maintenance budgets. Heat pumps can have a 15-year lifecycle, while boilers can have 25 – 30 years. Changing over to zero-emission fuel sources is one aspect of the financial commitment, but maintaining and replacing them in the future is another.

25 We are considering the following further duties on public sector organisations to support planning for the transition by 2038. Please tell us which option(s) you would support.

Placing a new duty on public sector organisations which would, from 2025, prevent them from replacing a polluting heating system with another (unless impractical);, Creating a new duty for each public body to develop and implement a plan to decarbonise their buildings;; Placing a new statutory reporting duty on public sector organisations to demonstrate progress towards their 2038 objective (with the potential for the 2038 then to be non-statutory); and/or

Please include any additional comments below:

7. Amendments to existing legislation

26 Do you agree with our proposals to include powers in the proposed Heat in Buildings Bill to change the current requirement in legislation for a narrowly-defined renewable heat target?

Yes

Please include any additional comments below:

Broadening the scope allows for more flexibility in achieving renewable heat goals, accommodating advancements in technology and changes in market dynamics or policy landscapes. It may encourage innovation by not limiting the scope to current technologies or methodologies.

A broader target can also integrate more with other energy and environmental goals, contributing to a more comprehensive and coherent approach to decarbonisation. It also aligns with best practices in policy-making, where flexibility and adaptability are key to accommodating future developments and ensuring long-term sustainability.

27 Do you agree that the Heat Networks (Scotland) Act 2021 should be amended in light of the passage of the Energy Act 2023?

Yes

Please include any additional comments below:

SNIFE believes such a move would ensure legislative coherence and addresses the evolving needs of the energy sector.

28 Are there any further amendments to the Heat Networks (Scotland) Act 2021 that the Scottish Government should consider?

Please include any additional comments below:

About you

29 What is your name?

Name:

Fiona Hodgson

30 What is your email address?

Email:

CEO@SNIPEF.org

31 Are you responding as an individual or an organisation?

Organisation

32 What is your organisation?

Organisation:

Scottish and Northern Ireland Plumbing Employers Federation (SNIPEF)

33 The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

34 We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

35 I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

Evaluation

36 Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: